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14
15 **BEFORE THE ARIZONA CORPORATION COMMISSION**

16 ROBERT "BOB" BURNS, Chairman
17 BOYD DUNN
18 SANDRA D. KENNEDY
JUSTIN OLSON
LEA MÁRQUEZ PETERSON

19 IN THE MATTER OF THE APPLICATION
20 OF ARIZONA PUBLIC SERVICE COMPANY
21 FOR A HEARING TO DETERMINE THE
22 FAIR VALUE OF THE UTILITY PROPERTY
23 OF THE COMPANY FOR RATEMAKING
24 PURPOSES, TO FIX A JUST AND
25 REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN.


Docket No. E-01345A-19-0236

**NOTICE OF FILING
SURREBUTTAL TESTIMONY OF
RONNY SANDOVAL ON BEHALF
OF VOTE SOLAR**

1 Vote Solar hereby provides notice that it has this day filed the attached Surrebuttal
2 Testimony of Ronny Sandoval.

3 RESPECTFULLY SUBMITTED this 4th day of December, 2020.


4 ARIZONA CENTER FOR LAW IN THE
5 PUBLIC INTEREST

6 
7 By _____
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11 ORIGINAL of the foregoing electronically
12 filed and 8 copies delivered this 4th day
13 of December, 2020 with:

14 Docket Control
15 Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

16 COPIES of the foregoing mailed/emailed
17 this 4th day of December, 2020 to the
18 persons identified on the attached service
list, consisting of three pages.

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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION)
OF ARIZONA PUBLIC SERVICE COMPANY)
FOR A HEARING TO DETERMINE THE)
FAIR VALUE OF THE UTILITY PROPERTY)
OF THE COMPANY FOR RATEMAKING) Docket No. E-01345A-19-0236
PURPOSES, TO FIX A JUST AND)
REASONABLE RATE OF RETURN THEREON,)
AND TO APPROVE RATE SCHEDULES)
DESIGNED TO DEVELOP SUCH RETURN)

SURREBUTTAL TESTIMONY OF RONNY SANDOVAL

**ON BEHALF OF
VOTE SOLAR**

I. INTRODUCTION AND WITNESS QUALIFICATIONS

Q. ARE YOU THE SAME RONNY SANDOVAL WHO PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. ARE YOU SPONSORING ANY EXHIBITS IN YOUR TESTIMONY?

A. No.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to feedback received related to my previous recommendations on the Company's approach to valuing and compensating customer energy exports, the Company's performance metric and formula rate concepts, and the Company's proposed rates for utility service to customers with distributed energy resources. I will also respond to changes in the Company's proposal, including the new adjustment mechanism.

III. METHODOLOGIES FOR VALUING AND COMPENSATING ROOFTOP SOLAR EXPORTS

Q. HOW DID THE COMPANY RESPOND TO YOUR RECOMMENDATIONS ON REFINEMENTS TO THE AVOIDED COST METHODOLOGY?

A. In my Direct Testimony, I recommended the Company include the entire list of value streams recognized in the Commission's guidance that is applicable to exported energy from rooftop solar in its Avoided Cost Methodology, explore new potential benefit streams, and that it continues to explore methods of refining the data sets and calculations that may provide more accurate and actionable signals.

1 The Company objected to including value categories in Avoided Cost
2 Methodology it deemed “speculative” or that it believes should be omitted.¹ It also
3 objected to my recommendations for performing studies to quantify the expected loss
4 reduction impact of distributed energy resources (DERs).

5 **Q. HOW DO YOU RESPOND TO THE COMPANY’S POSITION ON YOUR**
6 **AVOIDED COST METHODOLOGY RECOMMENDATIONS?**

7 A. While I disagree with the Company on substance of these issues, I ultimately agree with
8 its procedural recommendation (and the recommendation of Staff) that the Avoided Cost
9 Methodology not be addressed as part of this rate case. As Staff notes, a “docket already
10 exists that allows for the requisite input from a broad range of stakeholders” to “address
11 the far-reaching impacts for ratepayers across Arizona” associated with the Avoided Cost
12 Methodology.² I agree with Staff and APS that issues around the methodology and the
13 associated potential impacts on customers would more appropriately be addressed in their
14 own dedicated docket. The Company should continue to compensate exports from
15 rooftop solar customers through the use of the Resource Comparison Proxy (RCP). The
16 Commission should accept Staff’s recommendation and expressly identify in its Decision
17 which docket will address the Avoided Cost Methodology issues.

18 **IV. FORMULA RATE CONCEPT, PERFORMANCE METRICS, AND ADJUSTORS**

19 **Q. PLEASE SUMMARIZE THE COMPANY’S FORMULA RATE CONCEPT.**

20 A. The Company presented a Formula Rate concept that provided “incremental annual
21 adjustments to rates, based on agreed upon, Commission-approved inputs to a formula

¹ APS witness Albert at pg. 32, line 5.

² Staff witness Metzger at pg. 7, line 23.

1 that is established during a rate case”. The Company also offered that “performance
2 metrics related to reliability and customer satisfaction incorporated into the formula rate
3 concept.”³ accompanied by a “compliance filing process in parallel with the formula rate
4 update, with differing levels of compliance information for different levels of
5 performance”.

6 **Q. HAS THE COMPANY UPDATED THE FORMULA RATE CONCEPT IT**
7 **PRESENTED?**

8 A. Yes. The Company states that due to a lack of support from parties on its proposal for
9 the Formula Rate concept and other considerations, it would no longer be “pursuing this
10 proposal as part of its rebuttal case”. However, the Company believes that “there exists
11 an opportunity to continue to align interests from a number of parties, while providing
12 timely cost recovery for APS in its efforts to support a clean energy future for Arizona”.

13 **Q. HAS THE COMPANY IDENTIFIED ALTERNATIVE METHODS FOR**
14 **ALIGNING PARTY INTERESTS “WHILE PROVIDING TIMELY COST**
15 **RECOVERY”?**

16 A. Yes. In its rebuttal, the Company introduced a “new adjustor”⁴ to “provide for timely
17 cost-recovery of the capital carrying cost and expense of APS’s approved and prudent
18 clean plan investment.” The Company also presented alternatives to this adjustor “using
19 existing mechanisms”⁵ for the Commission’s consideration.

³ Rebuttal Testimony of Company Witness Snook at pg. 23, line 12.

⁴ Rebuttal Testimony of Company Witness Snook at pg. 15, line 9.

⁵ Rebuttal Testimony of Company Witness Snook at pg. 16, line 14.

1 **Q. HOW WOULD THE CLEAN ENERGY INVESTMENTS ELIGIBLE FOR THIS**
2 **ADJUSTOR BE DETERMINED?**

3 A. The Company indicates that clean energy investments would be “authorized by the
4 Integrated Resource Plan or Clean Energy Implementation Plan approval by the ACC and
5 subject to a robust request for proposal (RFP) process.” Only “approved and prudent
6 acquisitions” resulting from this process, and “not already recovered in base rates or
7 through another Commission-approved cost adjustment” would be included in the
8 adjustor for cost recovery.

9 **Q. DO YOU SUPPORT THE COMPANY’S PROPOSED NEW ADJUSTOR**
10 **MECHANISM?**

11 A. Yes. Investments that undergo the robust planning and acquisition process described by
12 the Company and obtain ACC approval should receive timely cost-recovery to ensure the
13 pace and scale required to meet the approved energy commitments are met.

14 **Q. HAS THE COMPANY IDENTIFIED ADDITIONAL POTENTIAL**
15 **MECHANISMS TO INCENTIVIZE PERFORMANCE?**

16 A. Yes. The Company indicates that it “supports a dialogue with the Commission,
17 stakeholders and other interested parties on the effectiveness and appropriateness of”
18 Performance-based Ratemaking “for jurisdictional utilities in Arizona.”⁶ The Company
19 and the Commission⁷ noted the existing docket⁸ that was opened to investigate the role of

⁶ Rebuttal Testimony of Company Witness Lockwood at pg. 25, line 9.

⁷ Correspondence from Commissioner Lea Márquez Peterson; November 11, 2020; Docket No. E-01345A-19-0236

⁸ Docket No. E-00000A-20-0019

1 performance incentive mechanisms for regulated investor-owned electric utility rate cases
2 in Arizona.

3 **Q. WHAT DO YOU RECOMMEND WITH RESPECT TO THE INVESTIGATION**
4 **INTO PERFORMANCE INCENTIVE MECHANISMS?**

5 A. I agree that a thorough investigation into performance incentive mechanisms in general
6 should involve significant stakeholder input and discussion as would be provided through
7 the dedicated docket just described. I would reiterate the recommendations from my
8 Direct Testimony to start early and allow for time spent on the front-end designing and
9 collecting data on performance metrics to ensure they can be used to effectively measure
10 progress on the desired objectives.

11 **V. ENERGY EFFICIENCY PROPOSAL**

12 **Q. THE COMPANY WELCOMED FEEDBACK FROM PARTIES ON A**
13 **PROPOSAL FROM SWEEP/WRA FOR CAPITALIZING DEMAND-SIDE**
14 **MANAGEMENT EXPENSES. WHAT DOES THIS PROPOSAL ENTAIL?**

15 A. The Company summarized SWEEP/WRA's proposal⁹ as one that would allow the
16 Company to earn a rate of return on EE investment "by creating a regulatory asset for the
17 annual expenditure and amortizing that over a 7-year period, with a return at the after-tax
18 cost of capital on the unamortized balance of this asset"¹⁰. Additional details on the
19 potential benefits of this proposal, application of practice across other states, and other
20 considerations are included in the Direct Testimony of SWEEP/WRA in this case.

⁹ Direct Testimony of SWEEP/WRA Witness Baatz at pg. 44, line 8.

¹⁰ Rebuttal Testimony of Company Witness Snook at pg. 17, line 6.

1 **Q. WHAT ARE YOUR OBSERVATIONS ON THE DESCRIBED PROPOSAL?**

2 A. The SWEEP/WRA's proposal offers significant potential benefits including advancing
3 investments in energy efficiency for the benefit of all customers, while managing rate
4 impacts and providing utilities additional incentives for pursuing these solutions. These
5 are attractive program traits, especially in the current economic environment with
6 customers potentially struggling with debt management and staying current with their
7 bills. Expanding energy efficiency across homes and businesses struggling due to the
8 current economic conditions could make future energy costs easier for program
9 participants to manage. This proposal could also assist the Company in achieving the
10 Commission's vision¹¹ for reducing electricity rates across Arizona and increasing the
11 economic competitiveness of the State. This proposal could align well with the
12 Company's recommendation to expand the eligibility criteria of its E-3 discount
13 program¹² to provide customers experiencing financial burden some potential relief, as
14 originally proposed by Wildfire in its Testimony - and which I support.

15 **Q. WHAT DO YOU RECOMMEND WITH REGARDS TO THIS PROPOSAL?**

16 A. Like the other novel proposals, the approach to capitalizing demand-side management
17 investments could benefit from stakeholder engagement within a dedicated regulatory
18 docket. Though dockets around demand side management program administration would
19 be a natural forum for consideration, this proposal could also have significant
20 implications on the kind of solutions that are procured in utility planning processes. The

¹¹ Correspondence from Commissioner Lea Márquez Peterson; November 11, 2020; Docket No. E-01345A-19-0236

¹² Rebuttal Testimony of Company Witness Hobbick at pg. 40, line 16

1 system-wide implications of this proposal should be considered to maximize potential
2 benefits and introduce the required safeguards.

3 **VI. GRID ACCESS CHARGE AND RATE DESIGN**

4 **Q. WHAT IS THE COMPANY'S PURPORTED BASIS FOR THE GRID ACCESS**
5 **CHARGE IMPOSED ON CUSTOMERS WITH DISTRIBUTED GENERATION**
6 **IN ITS REBUTTAL?**

7 A. The Company states that the Grid Access Charge "is necessary and appropriate to reduce
8 some of the \$1 billion cost shift from residential customers to other customers." The
9 Company also states "the introduction of more than 100,000 residential solar systems
10 causes the need for additional distribution level monitoring and voltage control, some of
11 which is intended to be recovered through this charge."¹³ Neither basis is supported by
12 the evidence.

13 The Company's argument that the Grid Access Charge is justified by a purported
14 \$1 billion "cost shift" assumes (1) the Company's Cost of Service results which contain a
15 number of questionable assumptions and methodologies specific to solar customers that
16 overstate costs and understate revenues as pointed out by SEIA witness Lucas, and (2)
17 that all solar customers and no non-solar customers produce a so-called "cost shift,"
18 which can then justify a grid charge applied to all solar customers but no other customers.

19 As I understand APS's argument, it claims a "cost shift" occurs any time a
20 customer produces less revenue than his or her cost of service. However, no customer
21 produces revenue exactly equal to his or her cost of service. There is no evidence that the

¹³ Rebuttal Testimony of Company Witness Hobbick at pg. 38, line 8

1 difference between a solar customer's revenues and costs are outside the diverse range of
2 residential customers as a whole. Yet, the Grid Access Charge is not imposed on the
3 non-solar residential customers who produce lower revenues proportionate to their costs,
4 and thereby also produce a "cost shift" under APS's theory. Moreover, not all solar
5 customers or solar customer sub-groups have the same ratio of costs and revenues, yet all
6 would be subject to the same grid access charge. Comparing solar customers' costs and
7 revenues to the wide range of costs and revenues of non-solar residential customers, there
8 is no basis for imposing additional grid charges on all solar customers and no non-solar
9 customers. That is especially true after correcting the cost of service assumptions and
10 methodology errors the Company makes that overstate costs and understate revenues.

11 APS's additional argument that there may be some "need for additional
12 distribution level monitoring and voltage control" is not supported by any actual
13 evidence, much less quantification, of any such costs. It is not clear that the additional
14 monitoring and voltage control APS alludes to is needed, nor that any additional
15 monitoring and control that may be needed is due solely to serve the needs of residential
16 solar customers. In addition, there is no evidence that only solar customers benefit from
17 any monitoring and control upgrades. If benefits extend to non-solar customers, it would
18 follow that these customers also contribute to the costs. In short, there is no proof of
19 additional costs of monitoring and control incurred solely for solar customers, that
20 monitoring and control upgrades will benefit only solar customers, and that the cost of
21 such controls equal to the revenue from the Grid Access Charge. Thus, there is no basis
22 that the Grid Access Charge.

Q. HAS THE COMPANY PROPOSED CHANGES TO ITS RESIDENTIAL RATE OFFERINGS IN ITS REBUTTAL?

A. Yes. After receiving stakeholder feedback, the Company has indicated it would consolidate its six residential rate offerings to three options to include: “one flat rate, one time-of-use rate, and one demand rate”. However, residential solar customers would not be eligible to sign-on to the flat rate option.¹⁴ Additionally, solar customers would continue to pay the Grid Access Charge while non solar customers would not.

Q. HOW DO YOU RESPOND TO THE COMPANY’S PROPOSAL FOR ITS REVISED RESIDENTIAL RATE OFFERINGS?

A. The Company correctly seeks to streamline its rate offerings to simplify customer options and facilitate better understanding of tradeoffs between rates. However, I believe the Company should also extend the flat rate option (without additional grid charge) to residential customers with solar as it is for “non-solar residential customers, regardless of usage”.¹⁵

VII. OTHER ISSUES

Q. ARE THERE ANY CORRECTIONS YOU WOULD MAKE TO THE COMPANY’S REBUTTAL TESTIMONY?

A. Yes. The Rebuttal Testimony of Company Witness Albert asserts¹⁶ that I criticized the operational capability and reliability of the Four Corners plant. However, my Direct Testimony does not include a discussion of the Four Corners plant, its reliability, or operational capability.

¹⁴ Rebuttal Testimony of Company Witness Hobbick at pg. 1, line 24

¹⁵ Rebuttal Testimony of Company Witness Hobbick at pg. 1, line 27

¹⁶ Rebuttal Testimony of Company Witness Albert at pg. 19, line 8.

VIII. CONCLUSION

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

- The Commission should direct the Company to address the avoided cost methodology in an existing docket separate from this rate case, as recommended by Staff and supported by the Company.
- The Commission should approve the new adjustor mechanism proposed by the Company to allow for the timely cost recovery of investments required to meet the energy commitments described in the Company's rebuttal testimony and summarized in my surrebuttal.
- The Company should work with stakeholders across the appropriate planning and program dockets to investigate the proposal to capitalize costs associated with demand-side management expenses.
- The Company should engage stakeholders, including through the open docket identified in this surrebuttal, on the development of appropriate performance metrics and safeguards required to ensure desired energy outcomes are achieved in a timely manner.
- Customers with solar should have access to the same rates, without any additional grid charge, that are available to other residential customers.
- The Company should correct its erroneous attribution of positions regarding the Four Corners plant to me.

Q. Does this conclude your direct testimony?

A. Yes.